



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NATIONAL VEHICLE AND FUEL EMISSIONS LABORATORY
2565 PLYMOUTH ROAD
ANN ARBOR, MICHIGAN 48105-2498

OFFICE OF
AIR AND RADIATION

December 21, 2000

Dear Manufacturer:

CCD-00-22 (LDV/LDT/SM/ICI/LIMO)

Subject: Model Year 2002-2003 Compliance Preview Meeting

EPA is conducting our annual audit of your certification, and fuel economy program plans. We would like to meet with you at your convenience to discuss your new product offerings, new technology, durability programs and emission compliance plans. Such a meeting will facilitate early resolution of problems and will expedite our certification review process. See Enclosure I for a list of topics to be discussed in the meeting.

This year, as you know, we are in the process of transferring the in-use compliance program for light-duty vehicles from our Washington, DC office to our Ann Arbor, Michigan office. We, therefore, would like manufacturers to also discuss in-use related programs for passenger cars and light-duty trucks at this preview meeting.

We would like to schedule these meetings as soon as possible, e.g. in January or February 2001. If it is not possible to schedule a meeting, please submit a written response. If a compliance preview meeting has already taken place, manufactures should schedule another short meeting (or send in a written response) to address any topics not covered in the previous meeting.

Please contact your certification representative to schedule a meeting time or to indicate your intentions to submit a written response.

Sincerely,

Gregory A. Green, Director
Certification and Compliance Division
Office of Transportation and Air Quality

Enclosures

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Enclosure I

Topics for Discussion at Annual Certification Preview Meeting

1. Organization Structure

- 1.1 Please provide an overview of your organization structure as it pertains to fuel economy, certification, and in-use programs, and provide a list of key contacts.

2. Product Line Description

- 2.1 What are your product plans for the 2002 model year (MY)? Are there any new models, carlines or new engines? Are you employing any new engine, drive train, transmission, emission, or fuel economy devices or technologies? Please provide brochures, pictures, or other available materials on new product lines.
- 2.2 Do you plan to certify any new design sport utility vehicles, mini-vans, or non-conventional trucks (such as passenger-oriented pick-up trucks with a small cargo bed) which haven't been previously audited by EPA? For these vehicles please outline the reasons why you intend to certify them as light-duty vehicles (passenger cars) or light-duty trucks, within EPA's definitions contained in 40CFR 1803-01.

3. Certification Issues

- 3.1 What is the timing of your 2002 MY programs regarding testing and certification? Are there any tight schedules? Are there any early MY2002 certification requests? What dates? How many test requests will be submitted to EPA (using the CAP 2000 test request form)? Please complete the attached chart of test vehicle projections and submit it as soon as possible (within three weeks if possible) to your certification representative.
- 3.2 Please give an overview of your CAP 2000 program for MY 2002. Provide a list of the test groups/durability groups you plan to certify.
- 3.3 Please provide the status of your CAP 2000 durability/in-use program. What is the source of your durability showing? Has it been approved by EPA? Please outline any changes which have been made since it was approved. Please provide an overview of the in-use test programs conducted in the past year for the alternative durability/CAP 2000 programs and for the in-use programs planned for 2002 and 2003 model year vehicles.

- 3.4 Do you have any ULEV, ILEV, Tier 2 or California LEV-II test groups? Please summarize.
- 3.5 Describe your alternative fueled vehicles for MY2002. Any zero emitting vehicles, electric vehicles, hybrid, or fuel cell vehicles ? How are the alternative fueled vehicles being tested? How will you demonstrate durability on these vehicles? What are your OBD, evaporative, and CAFÉ compliance plans for alternative fueled vehicles?
- 3.6 What are your phase-in plans for the Supplemental Federal Test Procedure (single roll dynamometer) program for LDV, LDT 1,2,3,4 vehicles.
- 3.7 What are your phase-in plans for ORVR? What 2002 MY test/evaporative groups incorporate ORVR?
- 3.8 Are there any OBD issues? Will you obtain CARB approval of your MY2002 OBD systems prior to requesting certification?
- 3.9 Are there any NLEV issues? Please explain how you intend to meet the fleet average NMOG emission standards described in 40 CFR86.1710-99. When do you intend to submit the 2000 model year annual report required by 40CFR86.1712-99? Do you intend to purchase or sell any emission credits? For any 2001 and later model year Tier I and TLEV vehicles which your company intends to sell in the Northeast Trading Region (NTR), please provide a table containing the projected 50-state sales, the projected NTR sales, the projected California sales, the test groups name and the carline name (ref 40 CFR 86.1711-99).

4. Fuel Economy Issues

- 4.1 Are you planning to incorporate any driver selectable devices or multi-mode transmissions in your product plans which haven't been previously approved by EPA? If so, please describe how they operate. Are any vehicles equipped with any driver-selectable devices which prevent the engagement of certain gears, prevent lock-up, or prevent overdrive operation? If so, does the driver selectable device reset to the enable position after the ignition is turned off (key off)?
- 4.2 Are you planning to incorporate any semi-automatic transmissions in your product plans, i.e. transmissions which can be easily operated in either the automatic or manual mode? If so, please describe how they operate. How will

the test vehicles be shifted to determine fuel economy (mpg) values for these vehicles¹?

4.3 Are there any fuel economy labeling or CAFE issues?

5. In-use Performance and Compliance Programs

5.1 Please provide an overview of any in-use testing programs conducted in the past year on 1996-2001 model year vehicles, other than the alternative durability and CAP 2000 testing programs. Approximately how many vehicles were tested?

5.2 Please provide an overview of the process your company uses to submit voluntary emissions recall reports to EPA, ref. 40 CFR 85.1904. When and where are these reports typically submitted to EPA? How are vehicle owners/leasees notified of the recall action described in the report to EPA?

5.3 Please provide an overview of the process your company uses to submit emission-related defect reports to EPA, ref. 40 CFR 85.1901. For example, describe how your company tracks emission related component failures in the field, how the EPA reporting process is triggered, and how your company assures that defect reports are submitted to EPA on time (within 15 working days after an emission-related defect is found to affect 25 vehicles or engines of the same model year).

5.4 After a defective emission-related component is identified, please provide an overview of the process your company uses to correct this and similar defects. For example, please discuss the method and time required to redesign, manufacture and distribute improved components to your assembly lines and to your dealer service personnel. What outreach methods are used by your company to notify assembly line, parts warehouse and dealer service network personnel that the defective component has been redesigned? How and when are Technical Service Bulletins sent to EPA?

6. Other Issues

6.1 Please discuss any other applicable certification, fuel economy, or in-use compliance issues or topics.

¹For vehicles equipped with semi-automatic transmissions, a transmission code of S2, S3, S4, S5, or S6 should be used in the EPA data base in the General Label input record (G2 record, column 7-8) and summary sheet input record (X2 record, column 19-20). This code will be used in the 2002 Fuel Economy Guide and on the 2002 EPA emissions website (www.epa.gov/autoemissions) to identify vehicles equipped with semi-automatic transmissions. However, for the Vehicle Information input record (V5 record, column 52-53) the transmission code should indicate how the vehicle is actually tested, i.e. in the automatic or manual mode.

EPA Light-duty Test Projections

2001 Calendar Year

Number of test waiver packages which will be submitted to EPA

MFR _____

Test Procedure:	FTP	FTP	2-D Evap	SFTP	FTP
Dynamometer:	Twin Roll	Single Roll	Any	Single Roll	Any
Fuel:	Gasoline*	Gasoline*	Any	Gasoline*	Non-Gasoline**

Jan 1- 15					
Jan 16-31					
Feb 1- 15					
Feb 15-28					
Mar 1-15					
Mar 16-31					
Apr 1-15					
Apr 16-30					
May 1-15					
May 16-31					
Jun 1-15					
Jun 16-30					
July 1-15					
July 16-31					
Aug 1-15					
Aug 16-31					
Sept 1-15					
Sept 16-30					
Oct 1-15					
Oct 16-31					
Nov 1-15					
Nov 16-30					
Dec 1-15					
Dec 16-31					

*Gasoline includes Indolene and Phase II test fuel

**Please indicate the type of fuel which will be used, e.g. CNG, Diesel, E85, etc.